

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta
Payments, Inc.

State of Montana, *ex rel.* Austin Knudsen,
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook
Holdings, LLC, Facebook Operations, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

MDL No. 3047

Case No.: 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

**DECLARATION OF MEGAN O'NEILL
IN SUPPORT OF STATE ATTORNEYS
GENERAL'S THIRD
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 I, MEGAN O'NEILL, declare and state as follows:

2 1. I am a Deputy Attorney General in the Consumer Protection Section of the California
3 Department of Justice. I am a member of good standing of the State Bar of California. I make this
4 declaration based on my own personal knowledge. If called upon to testify, I could and would testify
5 completely to the truth of the matters stated herein.

6 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State
7 Attorneys General's Third Administrative Motion for Leave to File Supplemental Information.

8 3. On August 28, 2024, Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments,
9 Inc., and Meta Platforms Technologies, LLC ("Meta") sent a Notice of Intent to Serve Subpoenas and
10 attached copies of 39 subpoenas to the Notice.

11 4. On August 30, 2024, Meta sent a Notice of Intent to Serve Subpoenas and attached copies
12 of 18 subpoenas to the Notice.

13 5. The subpoenas directed to state agencies differ from Meta's earlier Requests for Production
14 of Documents served on the State AGs which had purported to demand the State AGs produce documents
15 in the possession of numerous state agencies, including these agencies. The subpoenas contain new
16 requests directed to the agencies, while also repeating a subset of the prior Requests for Production of
17 Documents.

18 6. The State AGs seek leave to submit Meta's Notices of Intent to Serve Subpoenas through
19 their concurrently filed Third Administrative Motion for Leave to File Supplemental Information.

20 7. On September 4, 2024, counsel for Meta wrote that "Meta takes no position on" the State
21 AGs' Third Administrative Motion for Leave to File Supplemental Information.

22 8. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated
23 that it takes no position on the State AGs' Third Administrative Motion for Leave to File Supplemental
24 Information.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on September 4,
2 2024, in San Francisco, California.
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6 /s/ Megan O'Neill
7 MEGAN O'NEILL
8 Deputy Attorney General
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